

# Exhibit 1

## Filed Under Seal

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

\_\_\_\_\_  
WAYMO LLC, )  
 )  
Plaintiff, )  
 )  
vs. ) Case No.  
 ) 3:17-cv-00939-WHA  
UBER TECHNOLOGIES, INC., )  
OTTOMOTTO LLC; OTTO )  
TRUCKING LLC, )  
 )  
Defendants. )  
\_\_\_\_\_ )

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VIDEOTAPED DEPOSITION OF LIOR RON  
San Francisco, California  
Monday, April 19, 2017  
Volume I

Reported by:  
SUZANNE F. GUDELJ  
CSR No. 5111  
Job No. 2641996  
  
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1 milestones were Uber stock milestones.

2 BY MR. PERLSON:

3 Q Does Otto -- after the acquisition of Otto  
4 by Uber, did it cease to exist because it was merged  
5 into Uber, or does it still exist in some form? 11:39:24

6 A I'm not a legal expert on M&A transactions.  
7 There was a team handling that on both sides. And  
8 to the best of my understanding, Ottomotto is a  
9 subsidiary of someone. I don't know if it's Uber or  
10 Uber UTI or some entity within Uber. 11:39:51

11 Q Does Ottomotto have a -- have its own  
12 management team that's separate from Uber?

13 MR. HUME: Objection to the form.

14 THE WITNESS: I do not believe there's a  
15 separate management team. 11:40:23

16 BY MR. PERLSON:

17 Q Is it -- is it -- is Ottomotto run by Uber  
18 or is there some sort of corporate division of  
19 responsibilities between the two entities?

20 MR. PATCHEN: Object to the form. 11:40:39

21 THE WITNESS: As far as my understanding of  
22 the deal, all the actions of Ottomotto is basically  
23 part of Uber, so there's no separate structure to  
24 the best of my understanding.

25 BY MR. PERLSON: 11:40:57

1 Q So if there was an engineer who on the day  
2 before the acquisition was working for Ottomotto,  
3 the day after the acquisition, do they -- did they  
4 become Uber employees?

5 A I believe so. I believe that all the 11:41:15  
6 previous Ottomotto engineers are now part of Uber,  
7 basically Uber employees.

8 Q Okay. And you became an Uber employee  
9 after the Otto acquisition, correct?

10 A That's correct, yes. 11:41:29

11 Q Did you -- did you personally do any  
12 consulting work for Uber before the acquisition of  
13 Ottomotto was completed?

14 A What do you mean by "consulting"?

15 Q Well, do you have an understanding of what 11:41:53  
16 consulting is?

17 A Yeah, but like is it --

18 Q What -- how -- how would you view  
19 consulting to be in your experience in the business  
20 world? 11:42:08

21 A Giving advice. I'm trying to understand,  
22 are you asking about being paid for consulting or --

23 Q Sure.

24 A -- or giving advice on -- what --

25 Q Let me start again. 11:42:19